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Attorney for Defendant
XAVIER ROBERTS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No: 2:24-CR-0309-WBS
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO CONTINUE
vs.)	STATUS CONFERENCE AND EXCLUDE
)	TIME
XAVIER ROBERTS,)	
)	District Judge William B. Shubb
Defendant.)	New Date: September 8, 2025
)	Time: 10:00 a.m.
)	

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, HEIKO COPPOLA, Assistant United States Attorney, attorney for the UNITED STATES, and RACHELLE BARBOUR, attorney for Defendant XAVIER ROBERTS, that the status conference currently set for Monday, August 4, 2025, be continued to Monday, September 8, 2025 at 10:00 a.m., and that time be excluded for preparation of counsel.

The Government has provided hundreds of documents and dozens of video files for Defense counsel's review in this case. Since the start of the case, Defense counsel has been reviewing and analyzing the above, conducting legal research, meeting with her client, and otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional time to review discovery, discuss the case with her client and the Government, and continue to prepare.

The parties expect to finalize a plea agreement in the additional time requested and provide it to the Court for its review in anticipation of a change of plea at the next hearing. The

1 parties believe that failure to grant the requested continuance would deny defense counsel the
2 reasonable time necessary for effective preparation, taking into account the exercise of due
3 diligence.

4 Accordingly, the parties stipulate and request that the Court exclude time between the
5 date of the filing of this stipulation through the new status conference date of September 8, 2025,
6 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of
7 justice served by continuing the case as requested outweigh the interest of the public and the
8 defendant in a trial within the original date prescribed by the Speedy Trial Act.

9 Date: July 29, 2025

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11 HEATHER E. WILLIAMS
Federal Defender

12 /s/ Rachelle Barbour
13 RACHELLE BARBOUR
14 Attorney for Defendant
XAVIER ROBERTS

15
16 Date: July 29, 2025


KIMBERLY SANCHEZ
Acting United States Attorney

17 /s/ Heiko Coppola
18 HEIKO COPPOLA
19 Assistant U.S. Attorney
Attorney for the United States

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21 O R D E R

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23 The Court, having received and considered the parties' stipulation, and good cause
24 appearing therefrom, adopts the parties' stipulation in its entirety as its order.

25 **Dated: July 30, 2025**

26 
27 WILLIAM B. SHUBB
28 UNITED STATES DISTRICT JUDGE